

21 C.J.S. Courts § 303

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Courts

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VIII. Concurrent and Conflicting Jurisdiction

B. State and United States Courts

4. Enjoining Proceedings in Other Court

b. Exceptions to Anti-Injunction Act

§ 303. Protection of judgment exception to Anti-Injunction Act—
Effect of state court ruling on res judicata effect of federal judgment

[Topic Summary](#) | [References](#) | [Correlation Table](#)

West's Key Number Digest

West's Key Number Digest, [Courts](#)  508(1), 508(2.1)

The Anti-Injunction Act's relitigation exception is limited to those situations in which the state court has not yet ruled on the preclusive effect of the prior federal judgment.

The Anti-Injunction Act's relitigation exception, which allows a federal court to enjoin proceedings in state court where necessary to protect or effectuate the federal court's judgment,¹ is limited to those situations in which the state court has not yet ruled on the preclusive effect of the prior federal judgment.² Once the state court has finally determined that the federal judgment is not preclusive, that issue is settled and the federal courts cannot enjoin the state proceedings.³ The reasoning is that after a state court considers a res judicata defense and rules that a prior federal judgment

does not actually bar a claim, the interests in preventing possible relitigation are outweighed by heightened comity concerns except in the most extraordinary circumstances.⁴

Where the state court has ruled on the res judicata effect of the prior federal court judgment, the federal court considering enjoining the state court proceeding under the relitigation exception must first, as a threshold matter, look to that state's law of judgments to determine whether another court of that state would view the res judicata ruling as final and binding.⁵ If, under state law, a state court decision on the res judicata effect of a prior federal court judgment is final, a federal court injunction is barred even if the state court decision mistakenly rejects the res judicata effect of the prior federal judgment.⁶ In this situation, the challenge to the correctness of the state court's determination as to conclusive effect of the prior federal judgment must be pursued by way of appeal through the state-court system.⁷

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Footnotes

- 1 § 302.
- 2 U.S.—Bailey v. State Farm Fire and Cas. Co., 414 F.3d 1187 (10th Cir. 2005).
- 3 U.S.—Parsons Steel, Inc. v. First Alabama Bank, 474 U.S. 518, 106 S. Ct. 768, 88 L. Ed. 2d 877 (1986); Duffy & McGovern Accommodation Services v. QCI Marine Offshore, Inc., 448 F.3d 825 (5th Cir. 2006).
- 4 U.S.—Ramsden v. AgriBank, FCB, 214 F.3d 865 (7th Cir. 2000).
- 5 U.S.—St. Paul Mercury Ins. Co. v. Williamson, 224 F.3d 425, 47 Fed. R. Serv. 3d 1029 (5th Cir. 2000).
- 6 U.S.—Sandpiper Village Condominium Ass'n., Inc. v. Louisiana-Pacific Corp., 428 F.3d 831 (9th Cir. 2005).
- 7 U.S.—Sandpiper Village Condominium Ass'n., Inc. v. Louisiana-Pacific Corp., 428 F.3d 831 (9th Cir. 2005).

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State or federal law as governing applicability of doctrine of res judicata or collateral estoppel in federal court action, 19 A.L.R. Fed. 709.